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16 Attorneys for WAYMO LLC

17 UNITED STATES DISTRICT COURT

18 NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

19 WAYMO LLC,

20 CASE NO. 3:17-cv-00939-WHA

21 Plaintiff,

22 **DECLARATION OF FELIPE  
CORREDOR IN SUPPORT OF WAYMO  
LLC'S ADMINISTRATIVE MOTION TO  
FILE UNDER SEAL PORTIONS OF ITS  
MOTION TO COMPEL DEPOSITIONS  
OF DAVID BONDERMAN AND  
ARIANNA HUFFINGTON**

23 vs.

24 UBER TECHNOLOGIES, INC.;  
25 OTTOMOTTO LLC; OTTO TRUCKING  
26 LLC,

27 Defendants.

28

1 I, Felipe Corredor, hereby declare as follows.

2       1. I am an attorney licensed to practice in the State of California and am admitted to  
 3 practice before this Court. I am an associate at the law firm Quinn Emanuel Urquhart & Sullivan,  
 4 LLP, counsel for the Plaintiff Waymo LLC (“Waymo”). I have personal knowledge of the matters set  
 5 forth in this Declaration, and if called as a witness I would testify competently to those matters.

6       2. I make this declaration in support of Waymo’s Administrative Motion to File Under  
 7 Seal portions of its Motion to Compel Depositions of David Bonderman and Arianna Huffington, filed  
 8 concurrently herewith (the “Administrative Motion”). The Administrative Motion seeks an order  
 9 sealing the following materials:

Document	Portions to Be Filed Under Seal	Designating Party
Waymo’s Motion	Highlighted Portions	Defendants (blue highlighting)
Ex. 1 to Waymo’s Motion to Compel	Entire Document	Defendants
Ex. 2 to Waymo’s Motion to Compel	Entire Document	Defendants
Ex. 3 to Waymo’s Motion to Compel	Entire Document	Defendants
Ex. 4 to Waymo’s Motion to Compel	Entire Document	Defendants
Ex. 5 to Waymo’s Motion to Compel	Entire Document	Defendants
Ex. 7 to Waymo’s Motion to Compel	Entire Document	Defendants
Ex. 8 to Waymo’s Motion to Compel	Entire Document	Defendants
Ex. 9 to Waymo’s Motion to Compel	Highlighted Portions	Defendants (blue highlighting)

18       3. The highlighted portions of Waymo’s Motion, and the exhibits and highlighted  
 19 portions of exhibits identified in the table above, contain references to information that Defendants  
 20 have designated as confidential and/or highly confidential.

22       4. Waymo expects Defendants to file one or more declarations in accordance with the  
 23 Local Rules.

24       I declare under penalty of perjury under the laws of the State of California and the United  
 25 States of America that the foregoing is true and correct, and that this declaration was executed in San  
 26 Francisco, California on July 31, 2017.

1  
2 DATED: August 7, 2017  
3  
4

*/s/ Felipe Corredor*  
Felipe Corredor

**SIGNATURE ATTESTATION**

5 Pursuant to Local Rule 5-1(i)(3), I attest under penalty of perjury that concurrence in the filing  
6 of this document has been obtained from Felipe Corredor.  
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*/s/ Charles K. Verhoeven*  
Charles K. Verhoeven

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